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Attorneys for Plaintiffs Vivian Fiori Ariza and Roggie Trujillo

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VIVIAN FIORI ARIZA and ROGGIE
TRUJILLO, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

DELL INC., a corporation; BANCTEC, INC.,
a corporation; WORLDWIDE
TECHSERVICES, LLC, an entity; DELL
CATALOG SALES, L.P., an entity; DELL
PRODUCTS, L.P., an entity; DELL
MARKETING L.P., an entity; DELL
MARKETING L.P., LLC, an entity; DELL
MARKETING G.P., LLC, an entity; DELL
USA, L.P., an entity; and DOES 1 Through
10,

Defendants.

Case No. C09 01518 JW

**STIPULATED REQUEST AND
ORDER SHORTENING TIME AND
ACCELERATING BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION FOR PROTECTIVE ORDER
FORBIDDING DEPOSITION OF
THIRD PARTY IVAN ARIZA**

CLASS ACTION

Current Date: April 20, 2010
Current Time: 10:00 a.m.

Proposed Date: March 23, 2010
Proposed Time: 10:00 a.m.

Ctrm.: 5

Assigned to Magistrate Judge Patricia V.
Trumbull for Discovery Purposes

Action filed on April 7, 2009

Pursuant to Civ. L.R. 6-2, the parties, by their undersigned counsel, hereby stipulate,

subject to court approval, that the briefing and hearing schedule with respect to Plaintiffs' Motion for Protective Order Forbidding Deposition of Third Party Ivan Ariza ("Motion for Protective Order") be accelerated, and in support of this stipulation state as follows: On March 4, 2010, the Dell Defendants issued a subpoena to third party Ivan Ariza, noticing his deposition for March 19, 2010 in northern Virginia. Plaintiffs have filed the Motion for Protective Order concurrently herewith on the grounds that Mr. Ariza is a former employee of Plaintiffs' counsel, and as such, there are no nonprivileged, relevant areas of inquiry for his deposition. If Plaintiffs are entitled to a protective order forbidding the deposition of Mr. Ariza, the Motion must be heard and granted prior to the deposition in order to excuse Mr. Ariza's appearance. In order to allow the parties an adequate opportunity to brief whether Mr. Ariza's deposition should go forward, the Dell Defendants have agreed to continue Mr. Ariza's deposition date to March 26, 2010. The parties therefore agree, subject to the Court's approval, that the Motion for Protective Order will be heard on March 23, 2010, and the briefing schedule for the Motion for Protective Order will be accelerated as follows:

March 10, 2010: Filing Date for Plaintiffs' Motion for Protective Order

March 16, 2010: Filing Date for Dell Defendants' Opposition to Motion for Protective Order

March 19, 2010: Filing Date for Plaintiffs' Reply in Support of Motion for Protective Order

DATED: March 10, 2010

Respectfully Submitted,
STRANGE & CARPENTER

By: /s/
Gretchen Carpenter
Attorneys for Plaintiffs

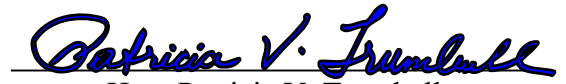
DATED: March 10, 2010

Respectfully Submitted,
REEVES & BRIGHTWELL, LLP

By: /s/
Matt Frederick
Attorneys for Dell Defendants

1 PURSUANT TO STIPULATION THE ABOVE-REFERENCED ACCELERATED BRIEFING
2 SCHEDULE IS SO ORDERED:

3 DATED: March 12, 2010



Hon. Patricia V. Trumbull
United States Magistrate Judge